

JONES DAY

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July 3, 2024

VIA ECF

The Honorable Michael E. Farbiarz
United States District Judge
U.S. District Court for the District of New Jersey
Frank R. Lautenberg U.S. Post Office & Courthouse
2 Federal Square
Newark, N.J. 07102

Re: United States v. Coburn and Schwartz, 19-cr-120 (MEF)

Dear Judge Farbiarz:

We represent the defendant Gordon Coburn in the above captioned matter. Together with co-defendant Steven Schwartz, we respectfully submit this letter proposing a briefing schedule as discussed during the hearing on July 2, 2024. The government has consented to the proposed schedule and page limits. Defendants intend to file two motions: first, a motion filed by Mr. Coburn, joined by Mr. Schwartz, concerning the constructive denial of Defendants' motion for overseas depositions and the proposed remedy (the "Constructive Denial Motion"); and second, a motion filed by Mr. Schwartz, joined by Mr. Coburn, concerning broader due process considerations and a request for discovery (the "Due Process and Discovery Motion"). The proposed schedule and page limits for these motions are below.

- To be filed by July 15, 2024: Defendants' brief in support of their Constructive Denial Motion, not to exceed 15 double-spaced pages; and Defendants' brief in support of their Due Process and Discovery Motion, not to exceed 25 double-spaced pages.
- To be filed by July 29, 2024: Government's combined opposition to Defendants' Constructive Denial Motion and Due Process and Discovery Motion, not to exceed 30 double-spaced pages.
- To be filed by August 5, 2024: Defendants' reply in support of their Constructive Denial Motion, not to exceed 7 double-spaced pages; and Defendants' reply in support of their Due Process and Discovery Motion, not to exceed 10 double-spaced pages.

If the Court agrees with the proposed schedule and page limits set forth above, we ask that Your Honor "So-Order" this letter in the space provided below. Thank you for your consideration.

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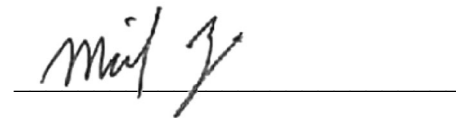
Respectfully submitted,

/s/ James P. Loonam
James P. Loonam

cc: All Counsel of Record (*via ECF*)

SO ORDERED:

This 10th day of July, 2024

A handwritten signature in black ink, appearing to read "Michael E. Farbiarz", is written over a horizontal line.

Honorable Michael E. Farbiarz, U.S.D.J.